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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

NOV - 2 1992

In the Matter of
RADIAN CORPORATION

Request for the Allocation of
Two MHz in the 914-916 MHz Band
for the Co-Secondary Use of
Wind Profiler Radar Systems

RM No. 8092

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: The Commission

OPPOSITION TO
PETITION FOR RULEMAKING

1. On August 13, 1992, Radian Corporation ("Radian") filed a Petition for Rulemaking, requesting that the Commission issue a Notice of Proposed Rulemaking to allocate two MHz in the 914-916 MHz band for co-secondary use for meteorological monitoring equipment. The Petition appeared on Public Notice, Report No. 1909, dated October 1, 1992. Pursuant to Section 1.405(a) of the Commission's Rules, Telxon Corporation ("Telxon") hereby submits its Opposition to the Petition which, for the following reasons, should be denied.

2. Telxon is a manufacturer of teletransactional data collection and retrieval systems for application in a number of commercial environments. These systems utilize a portable teletransaction computer ("PTC"), a handheld computer which provides data entry and application processing. Information gathered into the PTC via keyboard entry or through bar code

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reading equipment is then communicated with the system's host computer in one of two modes: batch or interactive. Batch transfer allows complete files of data to be sent to the host computer via cable or modem. Interactive applications allow record-by-record communication between the host and the PTC via radio frequency ("RF") networks, typically by means of spread spectrum equipment which operate over the frequencies 902-928 MHz.

3. A number of Telxon PTC systems utilizing spread spectrum RF communications currently operate at or near major airports, allowing airlines to coordinate the de-icing of aircraft and baggage control. In addition, numerous major auto rental firms utilize Telxon RF system's to expedite consumer check-in and check-out procedures and inventory of vehicles. Many of these firms have substantial operations at or near major airports.

4. By its Petition, Radian proposes the allocation of two MHz in the 914-916 MHz band for the continuous and unattended measurement of meteorological conditions. The system would operate by transmitting RF pulses on a continuous basis. According to the Petition, one of the primary applications of the system would be in the vicinity of airports.

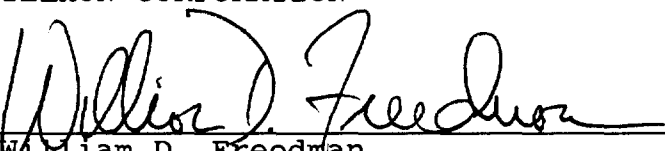
5. As demonstrated above, the frequencies proposed for such use by Radian are currently extensively utilized by Telxon's customers in various applications. Use of the same frequencies as proposed by Radian would severely adversely impact, if not render impossible, the continued operation of these existing PTC systems. The displacement of the numerous businesses currently utilizing

such systems that would result from implementation of the Radian proposal would clearly be inconsistent with the public interest. As such, Telxon opposes the allocation of the 914-916 MHz band proposed by Radian in its Petition and requests that the Petition be denied.

Respectfully submitted,

TELXON CORPORATION

By:


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November 2, 1992

CERTIFICATE OF SERVICE

I, Lilly A. Whitney, a secretary in the law offices of Gurman, Kurtis, Blask and Freedman, Chartered, do hereby certify that I have on this 2nd day of November, 1992, had a copy of the foregoing "OPPOSITION TO PETITION FOR RULEMAKING" mailed by U.S. first class mail, postage prepaid, to the following:

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